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*Attorneys for Michael Goldberg,
Trustee of the PFI Trust*

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re
PROFESSIONAL FINANCIAL
INVESTORS, INC., *et al.*,
Debtor.

Case No. 20-30604
(Jointly Administered)

Chapter 11

Adv. Proc. No. 24-03034

**STIPULATION FOR EXTENSION OF
TIME TO RESPOND TO FIRST
AMENDED COMPLAINT TO ALLOW
FOR MEDIATION**

Michael Goldberg, Trustee of the PFI Trust,
Plaintiff,
v.
Leslie Michelle Wallach, Manuel A. Romero,
and Charlene Albanese,
Defendants.

This Stipulation for Extension of Time to Respond to First Amended Complaint to Allow for Mediation is entered into by and between Michael Goldberg, the duly appointed Trustee (“*Trustee*” or “*Plaintiff*”), Leslie Michelle Wallach (“*Defendant Wallach*”), Manuel A. Romero (“*Defendant Romero*”), and Charlene Albanese (“*Defendant Albanese*”) by and through the undersigned attorneys of record.

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RECITALS

2 **WHEREAS** Plaintiff filed its *First Amended Complaint for Damages for Breach of*
3 *Fiduciary Duty, And To Equitably Subordinate Claims Pursuant to 11 U.S.C. Section 510(c)(1)*
4 (the “First Amended Complaint”) on February 21, 2025; and

5 **WHEREAS** the Court established in its Summons a responsive pleading deadline to the
6 First Amended Complaint of March 31, 2025; and

7 **WHEREAS** all parties in this action would prefer to delay the defendants' responsive
8 pleading deadline in favor of a mediation that includes the applicable insurance carrier to take
9 place in the near future, but no later than May 31, 2025;

10 || **NOW, THEREFORE**, the parties hereto stipulate and agree as follows:

STIPULATION

12 1. The parties shall attend and conclude a mediation with an agreed mediator that
13 includes the participation of the insurer no later than May 30, 2025.

14 2. The defendants' response deadline with respect to First Amended Complaint shall
15 be extended to the earlier of either fourteen days following the unsuccessful conclusion of the
16 mediation; or June 13, 2025.

17 3. In the event the mediation is fully or partially successful, Plaintiff shall promptly
18 advise the Court by way of an ex parte status report.

19 | Dated: March 19, 2025

PACHULSKI STANG ZIEHL & JONES LLP

By /s/ John D. Fiero
John D. Fiero

*Attorneys for Michael Goldberg,
Trustee of the PFI Trust*

1 Dated: March 19, 2025

KELLER, BENVENUTTI & KIM LLP

3 By /s/ David Taylor
4 David Taylor

5 *Attorneys for Charlene Albanese*

6 Dated: March 19, 2025

7 WINGET, SPADAFORA & SCHWARTZBERG, LLP

9 By /s/ Alexis King
10 Alexis King

11 *Attorneys for Leslie Michelle Wallach*

12 Dated: March 19, 2025

13 TADJEDIN THOMAS & ENGBLOOM LAW GROUP

15 By /s/ Wendy Thomas
16 Wendy Thomas

17 *Attorneys for Manuel Romero*